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**MEMO ENDORSED**

April 17, 2024

**VIA ECF**

Hon. Jessica G.L. Clarke, U.S.D.J.  
United States District Court  
Southern District of New York  
500 Pearl Street, Room 1040  
New York, NY 10007

Re: *Jefferson Siegel v. Sing Tao Newspapers New York LTD.*,  
Case No. 1:24-cv-01307-JGLC

Dear Judge Clarke:

We represent Plaintiff Jefferson Siegel ("*Plaintiff*") in the above-referenced action. Pursuant to Paragraphs 2(a) and 2(e) of Your Honor's Individual Practices, Plaintiff respectfully moves this Court for an extension of time to and including May 20, 2024, for Plaintiff to file a motion for default judgment with respect to the instant action.

In support of this Motion, Plaintiff includes the following:

- (1) The deadline for Plaintiff to file a motion for default judgement as to Defendant Sing Tao Newspapers New York LTD. ("*Defendant*") is April 19, 2024 (*text only entry dated April 4, 2024*);
- (2) This is Plaintiff's first request for an extension of time;
- (3) Good cause exists for the instant request as Plaintiff, via counsel, has made contact with Defendant's counsel regarding this matter and are engaging in discussions as to resolution by which would obviate the need for default proceedings;
- (4) in that Defendant has yet to make a formal appearance in this matter, there was no party with which Plaintiff could inquire as to their consent of this application;
- (5) There are currently no scheduled appearances for the parties with the Court.

The requested extension is made in good faith and granting this extension will not prejudice any party to this matter. Thank you for your consideration of this request.



Respectfully submitted,

/s/ Joshua D. Vera

Joshua D. Vera

*Counsel for Plaintiff*

cc: Counsel of Record

Application GRANTED. Plaintiff's deadline to file a motion for default judgment is extended to **May 20, 2024**. The Clerk of Court is directed to terminate ECF No. 13.

SO ORDERED.

A handwritten signature in blue ink that reads "Jessica Clarke".

JESSICA G. L. CLARKE  
United States District Judge

Dated: April 18, 2024  
New York, New York